

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)
IMPLANT PRODUCTS) MDL No. 2272
LIABILITY LITIGATION)
)
)
)

This Document Relates to All Cases Master Docket Case No. 1:11-cv-05468

Hon. Rebecca R. Pallmeyer

STIPULATION RE: RESPONSIVE BRIEFING
ON DEFENDANTS' MOTION TO DISMISS

The PSC and counsel for Defendants have conferred on a briefing schedule for Defendants' Motion to Dismiss (Doc. No. 258) and stipulate to the entry of the following briefing schedule and protocol:

1. Plaintiffs' response, not to exceed 50 pages, will be filed on or before April 23.
2. Defendants' reply, not to exceed 30 pages, will be filed on or before May 14.

Dated: March 13, 2012

Respectfully Submitted,

POGUST BRASLOW & MILLROOD, LLC

/s/ Tobias L. Millrood

Tobias L. Millrood, Esq.

Eight Tower Bridge, Suite 1520

161 Washington Street

Conshohocken, PA 19428

Phone: (610) 941-4204

Fax: (610) 941-4245

Email: tmillrood@pbmattorneys.com

James R. Ronca, Esq.
Anapol, Schwartz, Weiss, Cohan, Feldman &
Smalley, P.C.
1710 Spruce Street Philadelphia, PA 19103
Phone: (215) 735-1130
Fax: (215) 875-7700
Email: jronca@anapolschwartz.com

Timothy J. Becker, Esq.
Johnson Becker PLLC
33 South Sixth Street, Suite 4530
Minneapolis, MN 55402
Phone: (612) 333-4662
Fax: (612) 339-8168
Email: tbecker@johnsonbecker.com

Plaintiffs' Co-Lead Counsel

Peter J. Flowers Foote,
Meyers, Mielke & Flowers
3 North Second Street, Suite 300
St. Charles, Illinois 60174
Phone: (630) 232-6333
Fax: (630) 845-8982
Email: pjf@foote-meyers.com

Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I certify that on March 13, 2012, a copy of the foregoing *Stipulation Re: Responsive Briefing On Defendants' Motion To Dismiss* was filed electronically. Parties may access this filing through the Court's system. I further certify that on March 13, 2012, a copy of the foregoing *Stipulation Re: Responsive Briefing On Defendants' Motion To Dismiss* was sent by first-class United States mail, postage prepaid, upon the following:

Gregory T. Mueller
Frank & Mueller, LLC
308 North 21st Street, Suite 401
St. Louis, MO 63103

Shannon Lukei
Robinson, Calcagnie, Robinson, Shapiro & Davis
620 Newport Center Drive Suite 700
Newport Beach, CA 92660

/s/ Tobias L. Millrood.